

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

GRACE ESTABROOK,  
ELLEN HOLMQUIST, and  
MARGOT KACZOROWSKI,

Plaintiffs,

v.

THE IVY LEAGUE COUNCIL OF  
PRESIDENTS, PRESIDENT AND  
FELLOWS OF HARVARD COLLEGE,  
TRUSTEES OF THE UNIVERSITY OF  
PENNSYLVANIA,  
and NATIONAL COLLEGIATE  
ATHLETIC ASSOCIATION,

Defendants.

Case No. 1:25-cv-10281-WGY  
**ORAL ARGUMENT REQUESTED**

**DEFENDANT PRESIDENT AND FELLOWS OF HARVARD COLLEGE'S  
MOTION TO DISMISS THE COMPLAINT**

Pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6), Defendant President and Fellows of Harvard College hereby moves this Court to dismiss the Complaint (Dkt. No. 1) filed by Plaintiffs Grace Estabrook, Ellen Holmquist, and Margot Kaczorowski with prejudice. The grounds for this motion are set forth in Defendant's memorandum of law submitted herewith.

Dated: April 21, 2025

Respectfully submitted,

PRESIDENT AND FELLOWS OF  
HARVARD COLLEGE

By its attorneys,

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/s/ Anton Metlitsky  
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**REQUEST FOR ORAL ARGUMENT**

Pursuant to Local Rule 7.1(d), Defendant respectfully requests oral argument on this motion on the grounds that such oral argument may assist the Court in its consideration of the issues presented in this Motion.

/s/ Anton Metlitsky  
Anton Metlitsky

**LOCAL RULE 7.1 CERTIFICATION**

The undersigned counsel hereby certifies that counsel for Defendant has conferred with counsel for Plaintiffs in a good faith attempt to resolve or narrow the issues in this Motion. Plaintiffs did not assent to the relief sought in this Motion.

/s/ Anton Metlitsky  
Anton Metlitsky

**CERTIFICATE OF SERVICE**

I, Anton Metlitsky, hereby certify that on April 21, 2025, I electronically filed the foregoing *Motion to Dismiss the Complaint* using the CM/ECF system, which will send notification of such filing to all registered participants.

/s/ Anton Metlitsky  
Anton Metlitsky

Dated: April 21, 2025